

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA

NO. 3:21-CR-0054-N

v.

DANIEL REY SETTLE
a.k.a. "POLO"

GOVERNMENT'S PROPOSED WITNESS LIST

The United States of America (the "government") hereby submits the following proposed witness list. The government anticipates calling the following witnesses at trial.¹

Probable Fact Witnesses	
Name / Position	Subject Matter of Testimony
Dustin Hatch Detective Dallas Police Department 1400 Botham Jean Blvd. Dallas, TX 75215	Investigation of Settle and Adult Victim 1; investigative records related to Settle and Adult Victim 1; search of Settle's residence and arrest of Settle; review of contents of Adult Victim 1's cellular telephone; review of CashApp transactions by Settle and Adult Victim 1; review of communications between Settle and Adult Victim 1.
John Kochan Special Agent Department of Homeland Security – Homeland Security Investigations 125 E. John Carpenter Freeway, Suite 800 Irving, TX 75062	Investigation of Settle and Adult Victim 1; investigative records related to Settle and Adult Victim 1; review of communications between Settle and Adult Victim 1; arrest and interview of Settle.

¹ The government has not disclosed the addresses of Adult Victim 1, Latrone Antonio Hicks, or Sheyna Hicks out of concerns for witness safety but can provide these addresses to the Court upon request.

John Perez Special Agent and Group Supervisor Department of Homeland Security – Homeland Security Investigations 125 E. John Carpenter Freeway, Suite 800 Irving, TX 75062	Investigation of Settle and Adult Victim 1; Judge Toliver’s admonishment to Settle at his initial appearance in federal court.
Jayson Atwater Officer Dallas Police Department 1400 Botham Jean Blvd. Dallas, TX 75215	Response to May 29, 2020, stabbing of Adult Victim 1.
Adult Victim 1² c/o U.S. Attorney’s Office Dallas, Texas	Relationship with Settle during the charged time period; Settle’s direction of Adult Victim 1’s prostitution activities; Settle’s communications with Adult Victim 1 before and after Settle’s arrest for sex trafficking.

Possible Fact Witnesses	
Name / Position	Subject Matter Testimony
Latrone Antonio Hicks In federal custody	Settle’s statements about sex trafficking while in federal custody; Settle’s note to Latrone Antonio Hicks to relay information to Adult Victim 1; Latrone Antonio Hicks’ communications with his wife to convey a message to Adult Victim 1.
Sheyna Hicks McDonough, GA	Text message from Sheyna Hicks to Adult Victim 1 sent while Settle was in federal custody.

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² The identity of Adult Victim 1 has been disclosed to the defense but is not listed in this filing for safety and confidentiality reasons. The government will also provide the defense with Adult Victim 1’s new cell phone number upon receipt of it.

Experts	
Name / Position	Subject Matter Testimony
John Kochan Special Agent Department of Homeland Security – Homeland Security Investigations 125 E. John Carpenter Freeway, Suite 800 Irving, TX 75062	Human trafficking and the practices, tools, and methods commonly used by traffickers.
Dr. Shannon Wolf Associate Director of Counseling Program Professor of Psychology and Counseling B. H. Carroll Theological Institute 6500 North Belt Line Rd., Suite 170 Irving, TX 75063	Human trafficking; the practices, tools, and methods commonly used by traffickers; and the behavior of human traffickers and their victims.

To expedite the trial, counsel for Settle has agreed to stipulate to the authenticity of the records produced from the Cellebrite extraction of iPhone 7 bearing IMEI 354911097325005 and the authenticity of the jail calls and email communications (if any) produced from Dallas County Jail, FCI Seagoville, and Limestone County. The government would have called the following witnesses at trial to testify to the authenticity of the Cellebrite extraction, jail calls, and email communications had the defense not agreed to these stipulations.

Expert	
Name / Position	Subject Matter Testimony
Michael Freeman Senior Criminal Intelligence Analyst Dallas Police Department 1400 Botham Jean Blvd. Dallas, TX 75215	Performed Cellebrite extraction of iPhone 7 bearing IMEI 354911097325005.

Record Custodians	
Name / Position	Subject Matter Testimony
Kelly Elza Jail Technician Dallas County Sheriff's Office 111 West Commerce Street Dallas, TX 75202	Dallas County jail calls and records for Settle.
Carol Gentry Jail Technician Bureau of Prisons – FCI Seagoville 2113 North Highway 175 Seagoville, TX 75159	FCI Seagoville jail calls and records for Settle.
Terrence Moore Jail Technician LaSalle Corrections – Limestone County 910 N. Tyus Road Groesbeck, TX 76642	Limestone County jail calls and records for Settle.

Respectfully submitted,

CHAD E. MEACHAM
UNITED STATES ATTORNEY

/s Myria Boehm

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing will be served on counsel for the defendant in accordance with the Federal Rules of Criminal Procedure on the 25th day of November, 2022.

/s Myria Boehm
Myria Boehm
Assistant United States Attorney